

## HATCHER & TEBO, P.A.

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RE: T.J. on behalf of their minor child B.J. v. Espanola Municipal  
School District, et al.; USDC 13-741 ACT-WPL  
Jones v. Children, Youth & Families Department; USDC 13-1250 KBM-RHS

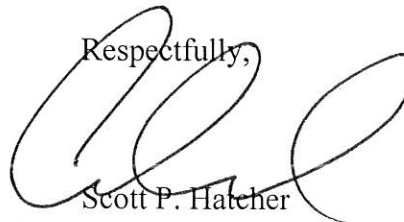
Dear Counsel:

As you know, I represent Martha Fernandez in the suit filed in federal court, as well as CYFD in the case originally filed in state court and removed by this office on December 31, 2013.

In my initial discussion about this case with Mr. Kennedy, I raised the subject of consolidation of these two suits. I also discussed the same with Mr. Garcia. It is my understanding that there is no objection to consolidating these two suits. Therefore, I attach herewith a proposed Motion to Consolidate and Order regarding same. I would appreciate it if all counsel confirmed their non-opposition to consolidation. If there is opposition, I will file this as an opposed Motion. I would ask that you advise me of your positions as soon as possible, as a Rule 16 conference has already been scheduled for late next month in the case originally filed in federal court.

Thank you for your attention to these matters.

Respectfully,



Scott P. Hatcher

SPH/jez

cc: Alexis Johnson, Esq., Claim No. 1101500-000  
Ann Halter, Esq.  
Martha Fernandez  
David Hudson

